NetRatings, Inc. v.180solutions, Inc. and Zango, Inc.
Case No. 06-3353 (BSJ) (HBP)

EXHIBIT A
JOINT CLAIM CONSTRUCTION CHART

TABLE 1[1]

**CLAIM TERMS FROM U.S. PATENT NOS. 5,675,510 ("'510 PATENT") AND 6,115,680 ("'680 PATENT")
NETRATINGS, INC. AND/OR 180SOLUTIONS, INC. AND ZANGO, INC. CONTEND REQUIRE CONSTRUCTION**

No.	Asserted U.S. Patent(s) Nos. and Claims[2]	Term	NETRATINGS' PROPOSED CONSTRUCTION	180SOLUTIONS' AND ZANGO'S PROPOSED CONSTRUCTION
1.	5,675,510 [1, 2]; 6,115,680 [1, 3, 12]	local computer use meters/user meter	a software program designed to collect information regarding the use of other software programs on a computer on which the software program is installed	A software program that collects information regarding the use of a personal computer
2.	5,675,510 [1]; 6,115,680 [1, 4, 12, 15]	log of predetermined [machine operation] events	a record of data regarding the occurrence of pre-selected potential events [related to machine operations]	A file created by the local computer use meter, capable of containing a time-sequential record of more than one previously identified internal [operating system] event
3.	5,675,510 [1]; 6,115,680 [1, 12]	installed in user computer machines	placed on and ready for use by a user computer	Placed on the user's computer, and ready for use by that computer
4.	5,675,510 [1, 10, 11]	log, event log	log - a record event log - no construction required	A file created by the local computer use meter, capable of containing a time-sequential record of more than one internal [operating system] event.
5.	5,675,510 [1, 9, 11]	machine operation events	events relating to operations performed on the computer	Operating system messages generated in response to user actions performed on the computer
6.	5,675,510 [1]	stored in memory of said computer machines	placed in memory of the user computer on which the local computer use meter is installed	Contained in non-volatile memory (e.g., hard drive) of the user computer
7.	5,675,510 [1]	identify titles of open windows and reflects a log of titles of world wide web pages	identify titles of open windows: contains characters identifying open windows reflects a log of titles of world wide web pages: reflects a record of characters useful in identifying world wide web pages	The log (1) contains the full names of open windows as they appear in an open window's title bar, and (2) reflects the full names of world wide web pages (e.g., Universal Resource Locator - URL) visited by the user

[1] The patents asserted in this action by NetRatings, Inc. are: U.S. Patent Nos. 5,675,510 ("'510 patent"); 6,115,680 ("'680 patent") and 6,138,155 ("'155 patent").
[2] Asserted claims in which the term to be construed appears are listed in brackets following the patent number.

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8.	5,675,510 [9, 11]	dictionary/ dictionary file	**dictionary: a database or file containing entries used to interpret or correlate data** **dictionary file: a file containing entries used to interpret or correlate data**	**A customizable file for identifying and interpreting the predetermined machine operation events contained in the log files.**
9.	5,675,510 [9]	means for interpreting the logged machine operation events by reference to the dictionary file	**Function:** interpreting the logged machine operation events by reference to the dictionary file **Structure:** A processing system programmed to perform the recited function, as described in the specification sections cited below, and all structural equivalents of such processing system. **Specifications citations:** Col. 1, ll. 57-60; Col. 2, ll. 63-67; Col. 5, ll. 23-40; Col. 5, ll. 51-63; Fig. 1.	**Function**: assigning meaning to events contained in the log files **Structure**: Because this element is subject to the requirements of 35 U.S.C. § 112, ¶ 6, the corresponding structure must be the specific algorithms disclosed in the specification for performing the recited function. The '510 patent, however, does not disclose any algorithm for performing the claim function, and thus 180solutions contends that this claim element is indefinite. In the even that the Court does not find this claim to be indefinite, 180solutions submits that the only disclosure in the specification that could conceivably be argued to be clearly linked to the recited function is as follows: A microprocessor based computer programmed to recognize the events contained in the log files based on the predetermined machine operation events identified in the dictionary file, and which further stores any unrecognized events for subsequent manual identification in addition to the dictionary file.
10.	5,675,510 [11]	storing each of the events in said log in the local computer memory of said user computer systems	**placing each of the events in the log in memory of the user computer on which the local computer use meter is installed**	**Copying the log of machine operation events that occurred on a user computer system into a non-volatile memory of the user computer system**

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11.	5,675,510 [11]	transferring said stored events from said plurality of user computer systems to a processing station computer	**transferring the stored machine operation events from each user computer system to a processing station computer**	**Transferring, from each user computer system to a processing station computer, the log of machine operation events previously stored on that user computer system**
12.	5,675,510 [11]	identify titles of windows and world wide web pages	**contain characters identifying windows and world wide web pages**	**The log contains (1) the full names of open windows as they appear in an open window's title bar, and (2) the full names of world wide web pages (e.g., URL) visited by the user.**
13.	5,675,510 [11]	correlates said titles to identifiable labels	**correlates titles to labels identifiable for reporting**	**The limitation is indefinite because the meaning of "identifiable labels" cannot be determined from the claim language or a reading of the '510 patent specification.**
14.	6,115,680 [1, 3, 4, 12, 14, 15]	events	**occurrences or actions detectable by a computer**	**Internal messages generated on the local computer in response to user action**
15.	6,115,680 [1]	stored in an associated user computer machine	**placed in memory or on a mass storage device in the user computer**	**Contained in non-volatile memory (e.g., hard drive) of the computer that is running the local computer use meter**
16.	6,115,680 [1, 12]	identifies character strings reflecting on-line activity	**identifies a group of characters that reflect activity performed on-line**	**Identifies character strings that uniquely indicate online activity**
17.	6,115,680 [1]	stores said log of predetermined events	**no construction required**	**Storing the entire log of machine operation events**
18.	6,115,680 [12]	logging predetermined events by a plurality of local computer use meters	**two or more local computer use meters recording data regarding the occurrence of pre-selected potential events**	**More than one local computer use meter maintains a log file on the local computer in which it is installed**
19.	6,115,680 [12]	storing said log of predetermined events by each use meter in an associated user computer machine	**placing the log of predetermined events logged by each use meter in the user computer**	**Copying the log of machine operation events that occurred on a user computer system into a non-volatile memory of the user computer system.**

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TABLE 2

CLAIM TERMS FROM U.S. PATENT NO. 6,138,155 ("'155 PATENT")
NETRATINGS, INC. AND/OR 180SOLUTIONS, INC. AND ZANGO, INC. CONTEND REQUIRE CONSTRUCTION

No.	Asserted U.S. Patent(s) Nos. and Claims	Term	NETRATINGS' PROPOSED CONSTRUCTION	180SOLUTIONS' AND ZANGO'S PROPOSED CONSTRUCTION
20.	6,138,155 [1-3, 6-10, 18, 19, 21, 26, 30, 33-35, 38, 41, 45]	resource	**computer data or program, such in the form of a Web page or part of a Web page, images, an ad banner, or an interactive game**	**a webpage**
21.	6,138,155 [1-3, 6-8, 26, 29, 33-35, 38, 41, 44]	executable program	**computer program that can be run on a computer**	**a program that can itself run on a personal computer (i.e., not source code)**
22.	6,138,155 [1, 33]	the executable program not being part of the resource	**the executable program not contained within the resource**	**the executable program cannot be associated (e.g., embedded) within the resource**
23.	6,138,155 [1, 10, 33]	client identifying indicia	**any information that can be used to associate data with a client**	**any information that can be used to identify the client**

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